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Hearing Date: October 24, 2011 at 10 a.m. (ET)
Objection Deadline: October 17, 2011 at 4 p.m. (ET)

-and-

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Attorneys for Wells Fargo Bank, N.A.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

DPH HOLDINGS CORP., et al.,

Debtors.

Chapter 11

Case No. 05-44481 (RDD)

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**NOTICE OF MOTION OF WELLS FARGO BANK, N.A., SUCCESSOR
TO WACHOVIA BANK, NATIONAL ASSOCIATION, UNDER
RULE 60(B) OF THE FEDERAL RULES OF CIVIL PROCEDURE
AND RULE 9024 OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE FOR RELIEF FROM THE ORDERS SEALING
COMPLAINT AND EXTENDING TIME FOR SERVICE THEREOF**

PLEASE TAKE NOTICE that Wells Fargo Bank, N.A., successor by merger to Wachovia Bank, National Association ("Wells Fargo"), by its undersigned attorneys, filed their *Motion of Wells Fargo Bank, N.A., successor to Wachovia Bank, National Association, under Rule 60(b) of the Federal Rules of Civil Procedure and Rule 9024 of the Federal Rules of*

Bankruptcy Procedure for Relief from the Orders Sealing Complaint and Extending Time for Service Thereof (the “Motion”).

PLEASE TAKE FURTHER NOTICE that a hearing to consider the Motion will be held on October 24, 2011 at 10:00 a.m. (prevailing Eastern Time) (the “Hearing”) before the Honorable Robert D. Drain, United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”), The Honorable Charles L. Brieant Federal Building and Courthouse, 300 Quarropas Street, Courtroom 118, White Plains, New York 10601-4140.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing, (b) conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York, the Supplemental Order Under 11 U.S.C. §§102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered March 20, 2006 (Docket No. 2883) (“Supplemental Case Management Order”), and the Nineteenth Supplemental Order Under 11 U.S.C. §§ 102(1) And 105 And Fed. R. Bankr. P. 2002(m), 9006, 9007, And 9014 Establishing Omnibus Hearing Dates And Certain Notice, Case Management, And Administrative Procedures, entered May 25, 2010 (Docket No. 20189) (together with the Supplemental Case Management Order, the “Case Management Orders”), (c) be filed with the Bankruptcy Court in accordance with General Order M-242 (as amended) – registered users of the Bankruptcy Court’s case filing system must file electronically, and all other parties-in-interest must file on a 3.5 inch disk (preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format), (d) be submitted in hardcopy form directly to the chambers of the Honorable Robert D. Drain, United States Bankruptcy Judge, and (e) be served upon (i) DPH Holdings Corp., 5725 Delphi Drive, Troy,

Michigan 48098 (Attn: President), (ii) counsel to the Reorganized Debtors, Butzel Long, Stoneridge West, 41000 Woodward Avenue, Bloomfield Hills, Michigan 48304 (Attn: Thomas B. Radom and Cynthia J. Haffey), (iii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, Suite 2100, New York, New York 10004 (Attn: Brian S. Masumoto), (iv) counsel for the agent under the Debtors' former postpetition credit facility, Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Attn: Donald S. Bernstein and Brian M. Resnick), and (v) counsel for Wells Fargo, 599 Lexington Avenue, New York, New York 10022 (Attn.: Mark D. Silverschotz) in each case so as to be **received no later than 4:00 p.m. (prevailing Eastern time) on October 17, 2011.**

PLEASE TAKE FURTHER NOTICE that only those objections made as set forth herein and in accordance with the Case Management Orders will be considered by the Bankruptcy Court at the Hearing. If no objections to the Motion are timely filed and served in accordance with the procedures set forth herein and in the Case Management Orders, the Bankruptcy Court may enter an order granting the Motion without further notice.

Dated: September 30, 2011

REED SMITH LLP
A Delaware Limited Liability Partnership

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